

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<u>NOLLE PROSEQUI</u>
	:	
-v.-	:	19 Cr. 830 (AT)
	:	
TOVA NOEL and	:	
MICHAEL THOMAS,	:	
	:	
Defendants.	:	
	:	
- - - - -	x	

1. The filing of this nolle prosequi will dispose of this case with respect to TOVA NOEL and MICHAEL THOMAS, the defendants.

2. On or about November 19, 2019, a grand jury sitting in this District returned Indictment 19 Cr. 830 (AT), which charged TOVA NOEL and MICHAEL THOMAS, the defendants, with committing offenses against the United States, to wit, conspiring to knowingly defraud the United States and to knowingly make and use a false writing or document, in violation of 18 U.S.C. § 371, and knowingly making and using a false writing or document, in violation of 18 U.S.C. § 1001.

3. On or about May 20, 2021, TOVA NOEL and MICHAEL THOMAS, the defendants, entered into deferred prosecution agreements with the Government. Under the agreements, prosecution was deferred for a period of six months during the term of NOEL's and THOMAS's good behavior, completion of community service, and

satisfactory compliance with the terms of the agreement. The United States Pretrial Services Office has informed the Government that NOEL and THOMAS have complied with the terms of the agreement during the period of deferral, which expired on November 20, 2021.

4. In light of the foregoing, the Government recommends that an order of nolle prosequi be filed as to TOVA NOEL and MICHAEL THOMAS, the defendants, with respect to Indictment 19 Cr. 830 (AT).

A handwritten signature in blue ink, appearing to read 'Nicolas Roos', is written over a horizontal line.

Nicolas Roos  
Assistant United States Attorney  
(212) 637-2421

Dated: New York, New York  
December 13, 2021

Upon the foregoing recommendation, I hereby direct, with leave of the Court, that an order of nolle prosequi be filed as to defendants TOVA NOEL and MICHAEL THOMAS with respect to Indictment 19 Cr. 830 (AT).



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Damian Williams  
United States Attorney  
Southern District of New York

Dated: New York, New York  
December 13, 2021

SO ORDERED:

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HONORABLE ANALISA TORRES  
United States District Judge  
Southern District of New York

Dated: New York, New York  
\_\_\_\_\_, 2021